



January 24, 2006

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: CS Docket No. 97-80 (Commercial Availability of Navigation Devices)

Dear Ms. Dortch:

On December 23, 2005, the National Cable and Telecommunications Association ("NCTA") disclosed and reported an *ex parte* meeting between representatives of NCTA, Comcast Corporation, Time Warner Cable, Cox Communications, CableLabs and the Media Bureau.

A list of purported "OpenCable™ ECR Participants" was included in the written *ex parte* communication. This list includes "Sharp Corporation" and its affiliate "Sharp Labs of America" [sic] (two times) ("Sharp").

The Commission should not interpret inclusion of Sharp on this list as an endorsement of the OpenCable Engineering Change Request ("ECR") process, which is designed and administered as a merely advisory process in which the cable industry has the only (and final) decision-making role. Sharp has participated in the ECR process in the past, in a good-faith effort to attempt to improve various OpenCable specifications. We suspect that many other organizations on this list would similarly disclaim endorsement of CableLabs' activities.

Furthermore, inclusion of Sharp on this list should not be interpreted as any sort of endorsement of any particular OpenCable specification or drafting process, nor endorsement of the state of the Phase II (bidirectional) cable compatibility negotiations.

Sincerely,
Sharp Laboratories of America

A handwritten signature in blue ink, appearing to read "Adam Goldberg", written over a faint circular stamp.

Adam Goldberg
Director, Television Standards & Policy Development